

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

UNITED STATES OF AMERICA,

Plaintiff,

-against-

RARE BREED TRIGGERS, LLC; RARE BREED FIREARMS, LLC; LAWRENCE DEMONICO; KEVIN MAXWELL,

Defendants.

Case No. 1:23-cv-00369-NRM-RML

DECLARATION OF DOUGLAS HILL

I, Douglas Hill, have personal knowledge of the facts set forth below, and if called as a witness I would testify as follows:

1. My name is Douglas Hill. I work in the information technology industry. In addition to my primary employment as Manager, Business Analysts, I also provide freelance website development, digital marketing, and social media content management services.

2. I have known Lawrence DeMonico and Cole Leleux since 2016. I came into contact with them through James Yeager.

3. In October 14, 2013, I first met James Yeager in Smyrna, Georgia. I was a fan of his YouTube channel and saw through a post on the channel that he was in Smyrna and needed additional camera equipment for a documentary he was producing regarding the dispute at the Bundy Ranch with the Bureau of Land Management.

4. I was able to meet Yeager and provided him additional cameras I was not using. In gratitude, Yeager extended an open invitation to train with his group in Camden, Tennessee for free.

5. Several months later, in 2014, I accepted Yeager's offer and went to Camden to train. The training was not conducted by Yeager, who was not present due to a scheduling conflict with a movie production.

6. Later in 2014, Yeager posted on his YouTube channel that he needed the assistance of someone tech-savvy to help him film content for SHOT show, a firearms industry convention. I let Yeager know that I was willing to assist him for free if he could obtain me access to SHOT show. Yeager agreed and I attended 2015 SHOT show as a videographer for Dave Biggers, an instructor at Tactical Response. During the convention, I developed a friendly relationship with Yeager, who told me I was now "family," would receive free training in Camden when I wanted, and could stay at his home.

7. The firearms enthusiast and training community in Camden that Yeager leads calls itself the Camden Mafia. It was through the Camden Mafia, which Yeager brought me into once I was "family," that I met Ben Thomas, also known as "Mookie."

8. Through our mutual affiliation with Yeager and the Camden Mafia, Thomas became aware of my freelance work in digital marketing and social media. He introduced me to Lawrence DeMonico to help DeMonico with his social media content management for his clothing company, Pipe Hitter's Union. Upon the success of my work, Ben hired me to provide these services for Spikes Tactical, where he worked at the time. It was through my involvement with Pipe Hitters Union and Spikes Tactical that I met Cole Leleux and Lawrence DeMonico.

9. I worked with Thomas for approximately two years, providing social media content management and other miscellaneous services.

10. In 2018, Thomas was caught embezzling from Spikes Tactical. As part of

Spike's Tactical's investigation into Thomas's embezzlement, I was asked about Thomas's activities. I answered truthfully and provided further information that assisted them in their investigation.

11. Thomas learned that I told Spike's Tactical about his wrongful conduct and he called me on the phone in a fury. He yelled at me that he would kill me, kill my family, burn down my house, and destroy my business. I hung up on him and he called me back to repeat his threats to murder me and my family, burn down my house, and destroy my business.

12. After Thomas made these death threats to me, I filed a police report with Deputy Sheriff H. Myers #378 at the Cherokee County Sheriff's Department in Georgia. An image of the business card for the deputy who assisted me with my case number, S021-006212, is attached as Exhibit A.

13. Thomas made good on his threat to destroy my business. After he made the threats, he went to the various firearms industry businesses I provided social media and digital marketing services for and lied about me to get them to withdraw their business. As a result of his actions, I went from making \$75,000/year from my freelance work to making \$4000/year.

14. As a result of his death threats and conduct to destroy my livelihood, I decided I no longer wanted to participate in the Camden Mafia, as Thomas was a major community member.

15. I wanted to sell Camden Mafia paraphernalia as part of my disengagement. At this time, I paid more attention to the iconography on patches and pins I had that Thomas produced for the Camden Mafia as part of his "Mookie's Militia" branding and realized that the primary element, a skull and crossbones which I originally thought was merely generic, was instead the same distinct design used by the SS Totenkopfverbände units of Nazi Germany. An

image of one of these patches is attached as Exhibit B. The Totenkopfverbande were the division of the SS responsible for administrating Nazi Germany's concentration and extermination camps. Wanting to be rid of these materials, I posted in social media groups for the Camden Mafia that these items were for sale.

16. Based on Thomas's word to the Camden Mafia and my attempt to disengage from the group by selling the paraphernalia I had newly discovered to contain Nazi symbols, Yeager declared to the Camden Mafia that I was effectively excommunicated from the group and that members were to have no contact with me.

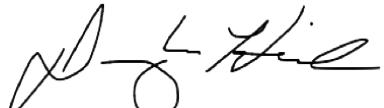
17. Yeager and the rest of the Camden Mafia stood by Thomas's actions towards me, including his death threats and destruction of my livelihood. Yeager produced a video stating his support for Thomas against Spikes Tactical and against me, and he and the Camden Mafia engaged in a social media campaign using the hashtag "IStandWithMookie" to signify their support for Thomas's actions. Yeager's attorney and business partner, Dana McLendon – whom Yeager and other members of the Camden Mafia refer to as "the Consigliere" – further reinforced the message to the Camden Mafia and me that I was excommunicated from the group and blocked on all social media. McLendon has the same "Totenkopf" SS skull symbol featured on Thomas's patches as a tattoo on his arm. An image of the tattoo is attached as Exhibit C.

18. My experience with the Camden Mafia shows that it is not a harmless group of firearms enthusiasts and jesters. There is a deep-running malice in the community that runs from its influential leaders, including James Yeager, Ben Thomas, and Dana McLendon, through its general membership. This malice includes violence, intimidation, doxing, social mobbing, and Nazi-imagery.

19. I am aware that Anthony Ciravolo is a member of the Camden Mafia community and that he was a participant in a sub-group within the Camden Mafia called "NSR Tactical." Pursuant to 28 U.S.C. § 1746, I hereby declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Executed on July 24, 2023

By:



Douglas Hill



Representing
Sheriff Frank Reynolds

EXHIBIT A

**CHEROKEE
SHERIFF'S OFFICE**

498 Chattin Drive
Canton, GA 30115
678-493-4200 Main
678-493-4140 Records
hdmyers@cherokeega.com

**D/S H. Myers #378
Uniform Patrol**

Case # SO21-006212

10:20

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EXHIBIT B



EXHIBIT C